

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**4E BRANDS NORTHAMERICA LLC<sup>1</sup>**

**Debtor**

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**CASE NO. 22-5009**

**CERTIFICATE OF COUNSEL/NO OBJECTION TO PLAN AGENT'S  
EMERGENCY MOTION TO TERMINATE RETENTION  
OF CLAIMS AND NOTICING AGENT  
[Related to Docket No. 564]**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for David Dunn, in his capacity as Plan Agent (the “Plan Agent”) of 4E Brands Northamerica LLC (the “Debtor”), certifies as follows:

1. On December 13, 2023, the Plan Agent filed his *Emergency Motion to Terminate Retention of Claims and Noticing Agent* [Docket No. 564] (the “Subject Motion”).
2. On December 14, 2023, this Court denied the emergency consideration of the Subject Motion and advised that it would consider the motion in the ordinary course [Docket No. 570].
3. The twenty-one (21) day deadline for parties to file responses to the relief requested in the Subject Motion was January 3, 2024. No responses to the relief requested in the Subject Motion were filed on the docket or received informally by counsel for the Plan Agent other than the response from the Court as discussed above.

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<sup>1</sup> The Debtor in this Chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is 4E Brands Northamerica LLC (0310). The Debtor’s principal place of business is 17806 Interstate Highway 10, Suite 300, San Antonio, TX 78257. The Debtor’s service address is: 41 W. Putnam Ave., STE 103, Greenwich, CT 06830.

4. The Plan Agent requests that the Court enter the proposed order filed concurrently herewith at its earliest convenience.

DATED: February 8, 2024

Respectfully submitted,

/s/Aaron Guerrero

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**ATTORNEYS FOR DAVID DUNN, PLAN  
AGENT**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron Guerrero

Aaron Guerrero